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February 8, 2019

Hon. Naomi R. Buchwald
500 Pearl Street
New York, New York 10007

Re: Noble v. Mount Olivet Church
Civil Case No. 18-cv-07871

Status Report

Dear Judge Buchwald:

Your Honor ordered the completion of discovery by October 29th. My office incorrectly calendered the deadline as November 1st. I apologize for my late report.

The Defendant has agreed to produce one more person for a deposition. If Your Honor permits another extension of our time, we intend to conduct that deposition before the end of November. In addition, the parties have requested cell phone records that we have not yet obtained and have not received.

Once that deposition is completed, and we have exchanged the remaining documents, we believe we will file a pre-motion letter for permission to move for summary judgment.

I have conferred with counsel before making this request for a final extension. I do not believe we will require any further extensions for discovery.

Thank you for your time and consideration.

Very truly yours,

S/Norma E. Ortiz

cc: David Broderick, Esq.